

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11069 (CTG)
(Jointly Administered)

Re: Docket No. 701

**LIMITED OBJECTION OF COMDATA, INC. TO NOTICE OF REJECTION OF
CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

Comdata, Inc. (“Comdata”), by and through its undersigned counsel, files this limited objection to the *Notice of Rejection of Certain Executory Contracts and Unexpired Leases* [Docket No. 701] (the “Notice”), and in support thereof states as follows:

1. Comdata is a payment processor and issuer of fleet fuel cards, corporate spend cards, paperless payroll cards, virtual payments, and trucking permits.
2. Prior to the Petition Date, Comdata provided various services to the Debtors pursuant to different agreements, including that certain Master Services Agreement between Comdata’s affiliate, Corporate Lodging Consultants, Inc. (“CLC”), and Debtor YRC, Inc. dated July 1, 2019.
3. Also prior to the Petition Date, Comdata entered into that certain Security Deposit Agreement, dated July 11, 2023, with Debtor YRC Enterprises, Inc.
4. In late-July 2023, both Comdata and CLC ceased doing business with the Debtors and CLC terminated its July 1, 2019 Master Services Agreement.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

5. On September 29, 2023, the Debtors filed the Notice indicating an intent to reject a “Master Services Agreement Dated 07/11/2023” between Comdata and Debtor YRC Enterprise Services, Inc. To the best of Comdata’s understanding, no such agreement exists.

6. As Comdata has ceased doing business with the Debtors, it does not, in theory, object to the rejection by the Debtors of any executory contract that it may be a counterparty to. However, on the face of the Notice, is unclear whether the Debtors are attempting to reject CLC’s Master Services Agreement or Comdata’s Security Deposit Agreement.

7. As such, Comdata lodges this limited objection to the extent that it may affect Comdata’s rights in some unknown contract. To the extent that the Debtors amend the Notice to make clear that they are rejecting the CLC Master Services Agreement, the Comdata Security Deposit Agreement, or both, Comdata will withdraw this limited objection.

WHEREFORE, for the reasons outlined above, Comdata respectfully requests that the Court deny the relief requested in the Notice and grant Comdata such other and further relief as is just and proper.

Dated: October 4, 2023
Wilmington, Delaware

CROSS & SIMON, LLC

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